

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SINGULARDTV, GMBH,

Plaintiff,

v.

Case No. 1:21-cv-10130

ZACHARY LEBEAU and KIMBERLY
JACKSON,

Defendants.

**SUPPLEMENTAL DECLARATION OF BENJAMIN J.A. SAUTER IN SUPPORT
OF MOTION FOR PRELIMINARY INJUNCTION**

I, Benjamin J.A. Sauter, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am an attorney duly admitted to practice law in the State of New York. I am a member of the bar of New York. I am currently a partner and attorney with Kobre & Kim LLP (“Kobre & Kim”), located at 800 Third Avenue, New York, New York 10022. Kobre & Kim is counsel for SingularDTV GmbH (“SingularDTV” or the “Company”) in this action.

2. I make this declaration in support of SingularDTV’s motion for a preliminary injunction and to supplement my previous declaration (Dkt. No. 16) in support of the same relief. The statements in this Declaration are true to the best of my own knowledge and belief.

3. Multiple public sources indicate that Gaze TV, a blockchain-based video platform, was founded by Zachary LeBeau, Kimberly Jackson, and Jack Cheng. These sources include: (i) a prior version of GazeTV’s website, a true and correct copy of which is attached as Exhibit 1; (ii) company information collected by Crunchbase, a true and correct copy of which is attached as

Exhibit 2; and (iii) media reporting by Hive, a true and correct copy of which is attached as Exhibit 3.

4. Attached as Exhibit 4 is a true and correct copy of a Q1 2021 PowerPoint presentation regarding a proposed SaaS platform.

5. Attached as Exhibit 5 is a true and correct copy of a June 21, 2021 e-mail from Jake Craven to Michael Kriak.

6. Attached as Exhibit 6 is a true and correct copy of an August 13, 2019 e-mail from Carl Volz to Amrita Rizal.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 10, 2021
New York, New York

/s/ Benjamin J. A. Sauter
Benjamin J. A. Sauter